

1 "integration" in terms of minorities into broadcasting hadn't
2 really brought anybody into broadcasting, hadn't really come
3 up, you know, in your mind before this?

4 A The, the integration of minorities into broadcast-
5 ing, I would have to say that certainly is the, the genesis of
6 my thinking and my motivation in what, what ensued. It was
7 indeed Mr. Wiley who, who, as I've said in this testimony,
8 impressed me very strongly that this was the, the new emerging
9 policy of the, of the Agency.

10 Q Well, what, what, if any, concept did you have of
11 what integration was supposed to be prior to your meeting with
12 Mr. Wiley? And here I'm not talking about minorities into
13 broadcasting. I'm just thinking of the word "integration" in
14 general. What, if any, understanding did you have of what
15 that concept was supposed to mean?

16 A Integration is simply to become involved with, in,
17 in, in my mind and in my thinking, then and now.

18 Q Now, by involved with, that could be -- I, I suppose
19 that could be rather broad in scope. That could be as limited
20 as somebody simply sitting, perhaps, as a member of the Board
21 and casting an occasional vote or it could be as involved as
22 somebody who is actually managing one or more properties on a
23 day-to-day basis. What, if anything, did you have in mind
24 there?

25 A To me, sir, you've described it perfectly.

1 Q That whole range then.

2 A Integration is a very broad range, yes, sir.

3 Q That, that's what you understood it to be?

4 A Indeed.

5 Q So, in other words, it would not be, and I emphasize
6 "not be" fair to state that you understood "integration" to
7 mean involving minorities in some meaningful fashion in the
8 ownership and management of TBN?

9 A I, I think it could include both.

10 Q So, it would be fair to state that you understood
11 integration to mean involvement in both ownership and
12 management?

13 A It, it certainly could.

14 Q All right. Then maybe I have to define management a
15 little further. When I, when I use the term "management,"
16 obviously I have something in mind, but what I want to know is
17 what does the word "management" mean to you in the concept of
18 operating an entity such as TBN?

19 A Management is -- excuse me -- the, in the case of a
20 TBN station, for example, it would simply be the chief opera-
21 tor, the, the boss of that particular station.

22 Q That would be the station manager then?

23 A Yes.

24 Q All right. Would it include any persons other than
25 just the station manager? Would there be persons at -- and

1 let me use an example. Let's, let's focus on, say, Indiana,
2 take Indiana as an example. You've got the station manager
3 who is involved in management. Now, are there people back at
4 TBN who are also involved in the management of Indiana?

5 A Not in a direct administrative sense. The manager
6 would have junior level people or mid-management people under
7 him or her: a chief engineer, for example, a production
8 director, a community affairs director, et cetera, other
9 departmental heads under that station manager in an individual
10 station such as Indianapolis. The chief engineer, however,
11 for example, would certainly look to Mr. Miller in California
12 for guidance, for direction, and perhaps even in some cases an
13 order. Generally speaking, the chain of command came from the
14 station manager down through the mid-management to the lower-
15 level individuals, but Network departmental heads certainly
16 had a lot of input and advice and, in some cases, even a
17 directive to give to that station manager and even to the mid-
18 management people within an individual station.

19 Q The Network departmental heads would include, as you
20 mentioned, Mr. Miller, who was the head of Engineering and
21 essentially the head of Engineering, so far as I can tell,
22 during this entire 13-year period that we're looking at? That
23 -- would that be correct?

24 A That would be essentially correct.

25 Q Then we would also have the person who's in charge

1 of Programming at the Network and I -- as I understand it from
2 the records, those persons have varied over time, but that
3 person would have a management role, not necessarily on a day-
4 to-day basis, but certainly a management role relative to
5 Indiana?

6 A Limited. More an advisory, more of a counselling
7 role, but in some cases a, a directive role, yes.

8 Q Then there would be Network Finance people --

9 A Yes.

10 Q -- who would be involved in management in some
11 fashion. Now, outside of Engineering, Programming, and
12 Finance, is there anybody that I, that I might have missed?

13 A That pretty well covers it. I think there, there
14 would be some junior level divisions within departments, like
15 Payroll within Accounting and, and so on, but I, I think
16 that's the main --

17 Q And then --

18 A -- scope.

19 Q -- overseeing the station manager as well as the
20 department heads at TBN, there essentially would be two
21 Boards. Apparently, there would be the Indiana Board on the
22 one hand, and then there would be the Network Board on the
23 other hand?

24 A Yes. But in the case of Indiana, it's an identical
25 Board. So, they, they were common.

1 Q Very good. Now, to you, did ownership in the con-
2 text of a nonstock, nonprofit corporation like TBN simply mean
3 membership on the Board of Directors?

4 A Yes, sir.

5 Q Did it ever come to your attention outside of the
6 proceeding that we're in now that ownership and control might
7 not, and I emphasize not, be equivalent depending on the form
8 of ownership involved?

9 A Ownership and control might not be equivalent?

10 Q Yes, sir. Did that ever, did that ever come to your
11 attention? Or did you always equate ownership and control in
12 your mind?

13 A Ownership is control in my mind.

14 Q That's how you understood it?

15 A Absolutely, sir.

16 Q Were you ever informed that the Communications Act
17 distinguishes between ownership and control?

18 A Was I ever what?

19 Q Informed.

20 A Prior to this proceeding?

21 Q Yes, sir.

22 A No, sir. Not to my knowledge.

23 Q Were you ever informed that the FCC, the Commission,
24 distinguishes between ownership and control?

25 A All of this now is prior to this proceeding now?

1 Q Yes, sir.

2 A And the question once again, sir?

3 Q Were, were you ever informed that the FCC distin-
4 guishes between ownership and control?

5 A I, I, I cannot recall any such information.

6 (Off the record.)

7 (On the record.)

8 BY MR. SHOOK:

9 Q I, I'd like to move on to a different topic. Now,
10 focusing on the present, when a construction permit for a low-
11 power television station or a translator station is granted,
12 is there a process for alerting various individuals within the
13 Trinity organization of that grant?

14 A Yes. I believe that, generally speaking, Mrs. Duff,
15 who is in charge of that general area would alert Engineering,
16 typically my office, and there may have been even other areas
17 and departments that were, that were at least notified.

18 Q Well, let's, let's take an example, and I'm not
19 saying that this is something that happened. I'm just using
20 it as an example to flesh this out. Let's say tomorrow that
21 the FCC were to grant TBN a low-power construction permit
22 application for Syracuse, New York. That permit, what happens
23 after the Commission grants that permit in terms of notifica-
24 tion of, of your office?

25 A Mrs. Duff, as I said, would, would typically notify

1 Mr. Miller. He would then begin making plans through his
2 department for the construction of that station. Mrs. Duff
3 would typically notify me. That's always kind of exciting
4 news and, and I would typically, as soon as permissible, air
5 that news on a little daily program that I do called Behind
6 the Scenes that sort of keeps our partners up-to-date on some
7 of the exciting things happening in the network.

8 Q So, that would be a piece of good news. You know,
9 you, you would let your -- I gue-- you said partners. You
10 would let your partners know that: we had a permit applica-
11 tion for Syracuse, New York, and today the Commission granted
12 it?

13 A Indeed.

14 Q Now, outside of notifying yourself and Mr. Miller,
15 are you aware of anyone else who Mrs. Duff would, would tell
16 about the grant of the permit?

17 A It seems to me there's quite a little list on the
18 bottom of that memorandum that fans that information out to
19 other departments, but I'd have to review that list to tell
20 you.

21 Q We may be thinking of two things, and I want to make
22 sure we're both thinking of the same thing. The document that
23 I believe you're referring to, if memory serves me, dealt with
24 when construction of a project was completed and the station
25 was about to go on the air. What I'm thinking of is a much

1 earlier point in time, and that is when the FCC first says:
2 you've got a permit; you can go ahead and start building.
3 That's, that's what I'm focusing on. So, with that in mind,
4 does that change anything that you told me?

5 A I think the dissemination of that information would
6 be very similar to the same information that would be dissemi-
7 nated on the eve of that station being completed and going on
8 the air. That pretty much the same individuals, I believe,
9 would, would typically be notified.

10 Q But it would also be treated as a piece of good news
11 from your end, that the Commission granted a permit for con-
12 struction of a low-power station in, you know, some place?

13 A Yes, sir. I would typically announce that as well
14 as, of course, the even more exciting day would be the day it
15 signs on the air.

16 Q Now, outside of the situation that was talked about
17 yesterday at some length, that being the Houston, Texas,
18 situation where National Minority -- I tell you what. I'd
19 better backtrack a second.

20 Was the process any different in terms of who would
21 be notified if the construction permit were granted to
22 National Minority as opposed to TBN?

23 A You know, sir, I, I, I don't know. I really have
24 not focused on that and I don't know if there would be any
25 difference.

1 Q Well, maybe I should put it to you this way. Are
2 you aware of any difference?

3 A I am not personally aware of any difference, no,
4 sir.

5 Q So, in all likelihood, if the Commission were to
6 grant National Minority a construction permit for a low-power
7 station in Syracuse, New York, the same process that you had
8 described with respect to TBN would also occur with respect to
9 NMTV?

10 A I certainly believe that Mrs. Duff would, in addi-
11 tion to that, notify other members to the Board of National
12 Minority, and I believe that was the case. So, that probably
13 would be the primary difference.

14 Q Would the same be true once that station were con-
15 structed, that not only yourself and Mr. Mayo and that laundry
16 list of persons would be notified, that there would be notifi-
17 cation of the Board membership of NMTV?

18 A I, I certainly believe that to be the case.

19 Q Now, could you tell us, you know, what the basis for
20 that belief is? Is it based on your personal knowledge of
21 what has actually occurred or is it based on what you would
22 like to be the case or, you know, have you been told
23 something?

24 A It's based probably more on what I would expect and
25 desire to, to be told and what I certainly believe is the

1 case.

2 Q So, it would be -- I would be correct if, if I were
3 to say that you don't really know, but you're hopeful that
4 that is what would have happened?

5 A That's a fair statement.

6 Q Now, in light of that, other than the Houston,
7 Texas, situation for which there was a fair amount of testi-
8 mony yesterday, are you aware of a situation when a permit for
9 a low-power station or translator station was received, was
10 granted by the FCC, but then the station was not built?

11 A I was generally aware that that construction permit
12 had been issued by the Agency.

13 Q Well, that, that's not -- I mean, I may get to that,
14 but that's not my question right now. My question right now
15 is other than that situation in Houston, Texas, other than,
16 are you aware of a situation when a permit was issued to build
17 a low-power station or translator station, and this can be now
18 either for NMTV or TBN, that the station was not built?

19 A I'm not aware of any specifics, Mr. Shook. I, I am
20 generally aware that there have been a very few isolated cases
21 where, for one reason or another, improper engineering, impro-
22 per site selection, or whatever, I think there have been, and
23 I think I could count on one hand the number of those that
24 perhaps have not been built through the years.

25 Q All right. And that would have, that would have

1 occurred because the FCC grants a permit and it's for site A
2 and you discover to your horror that site A is no longer
3 available or just will not do what you want it to, and in your
4 search for site B you just can't find it, it's not there?

5 A Exactly. In, in some of these permits so much time
6 has passed that the original site designated has been sold to
7 another party or the tower's been taken down or, or some event
8 has occurred that makes it impossible for us to build at, at
9 that site. So, our choice then is to simply re-engineer or go
10 back to the Agency and, and seek a site change or, or some
11 other remedy to the problem.

12 Q Okay. So, in other words, it would be the practice
13 of TBN and NMTV, if, if that site problem that we've just been
14 talking about, if that site problem were to have occurred,
15 that TBN's practice would not be to hand the permit back in or
16 sell the permit but to try to find some way through a site
17 change application to get that permit built?

18 A We would typically do that. There, there's one
19 other mitigating factor that might enter in here. If, for
20 example, it was learned that that station area is now being
21 covered by some other station that, an affiliate station that
22 might have come on the scene in this waiting period, that
23 might influence the decision, and perhaps in a few cases to
24 simply never build that station.

25 Q How many situations like the one you've just

1 described can you tell me have occurred?

2 A That would be impossible for me to do, Mr. Shook, I
3 -- as I, as I told you, it would be, it would be fairly iso-
4 lated, a very few, because I think the record will show that,
5 that Trinity and/or National Minority or any of the affiliates
6 of Trinity have been diligent in, in, in building these
7 stations.

8 Q I'd like to shift gears and start looking at the
9 exhibits that we have and ask you a couple of questions about
10 those. Oh, actually, I'm sorry. I misspoke. Let's -- I'd
11 like to clarify a few things first. Let's move to paragraph
12 11 of your testimony.

13 A Page?

14 Q Page 5.

15 A All right, sir.

16 Q Focusing your attention on the second sentence in
17 that paragraph.

18 A All right, sir.

19 Q My question to you is how long, and if you're not,
20 not sure of a date you can give me an approximation, how long
21 has TBN operated a 24-hour per day program service?

22 A I believe it was sometime in the late '70s that we
23 finally made the transition from a approximately 16-hour day
24 to the full 24 hours. I couldn't put my finger on the exact
25 year.

1 Q But late '70s would cover it?

2 A I believe so.

3 Q All right. I'd like you now to turn to page 6.

4 Specifically, paragraph, paragraphs 14, 15, and 16. You don't
5 have to study them right now, but just glance through them,
6 familiarize yourself with what's there.

7 A Yes, sir. I've generally scanned it.

8 Q All right. The responsibilities that are described
9 in paragraphs 14, 15, and 16, how far back would you say that
10 the description that you have here accurately portrays what
11 you've been doing?

12 A Well, a great deal of it would go back virtually to
13 the beginning of the, the network, the Praise the Lord program
14 hosting, behind the scenes. Of course, only as the number of
15 stations grew domestically and foreign did, did that area of
16 time and involvement increase. The telethons were from the
17 very beginning. Almost all of this was, was virtually from
18 the beginning with the addi-- with the exception, of course,
19 of the additional stations that came on line through the
20 years.

21 Q So, the variable -- the principal variable from the
22 beginning to the present would be the travel that you would
23 have to engage in as a result of foreign stations and then a
24 larger number of domestic stations?

25 A Yes, sir. The travel would have just been on a

1 continually upward curve.

2 Q So, let's say in 1980 you may have had three weeks
3 of travel whereas today it's two months?

4 A That -- I don't think I could dispute that.

5 Q I mean, that would be a fair understanding?

6 A I believe it would.

7 Q Now, focusing on a Board meeting, let's, let's talk
8 about a typical TBN Board meeting, and, and we'll look at it
9 in terms of the present and then work our way back. At the
10 present time the Board of TBN consists of yourself, your wife,
11 and Mr. Juggert. Correct?

12 A Yes, sir.

13 Q For the Annual Board Meeting of TBN, would there be
14 some agenda prepared beforehand and then distributed to the
15 other Board members so that the Board members would know what
16 was going to be discussed at the Annual Meeting?

17 A Typically, yes.

18 Q How much lead time is there typically between the
19 time the agenda is prepared and distributed and the time of
20 the meeting?

21 A The agenda generally gets compiled over a much
22 longer period of time. Items will come to my office, for
23 example, that I feel needs Board action, so I'll put that in
24 a, in a, in a file. From that file over maybe some weeks will
25 then be compiled the agenda that you refer to, and that agenda

1 would probably be compiled and distributed typically a few
2 days, a week or two maybe, before the actual Board meeting.
3 Now, here, please remember, I'm speaking now primarily about
4 the, the major Annual Board Meeting that was typically con-
5 ducted in January.

6 Q No, that was the focus of my question. So -- and I
7 -- we're on the same wavelength.

8 A Okay.

9 Q So, the, the person who are going to attend the
10 Board meeting, the TBN Board meeting, and perhaps we should
11 have an additional clarification here to make sure we under-
12 stand each other, the TBN Board meeting would not just be for
13 TBN but would also include the owned and operated stations,
14 would it not?

15 A Yes.

16 Q All right. So, that the agenda would cover not only
17 TBN business, but would also cover the business of Arizona and
18 Oklahoma City, Indiana, et cetera?

19 A Yes.

20 Q All persons who were going to come to the meeting
21 would have advance notice of some -- in some way of what was
22 going to happen at the meeting?

23 A Certainly the Board members would --

24 Q Now, by the Board members, are we talking about only
25 the three or would we also be including anyone else who was a

1 Board member of one of the owned and operated stations?

2 A Yes. I believe they would also receive -- certainly
3 notice of that meeting and an invitation to it.

4 Q Now, I'm not thinking about notice of the meeting.
5 Now, I'm not thinking about, you know, here's the meeting.
6 Come, show up. We're going to talk about things. I'm talking
7 about does the person know before he or she walks into that
8 meeting what's likely to be talked about?

9 A I am not 100 percent sure that a copy of that agenda
10 is made available to other individual Board members such as
11 New York, Oklahoma, Denver, et cetera.

12 Q But we're talking present practice.

13 A Yes, sir.

14 Q But you, you would know beforehand?

15 A Yes.

16 Q Would Norman Juggert know beforehand?

17 A Yes.

18 Q Would Janice Crouch know beforehand?

19 A Yes.

20 Q So, at least you three would know what was going to
21 happen?

22 A Yes.

23 Q Now, going back in time, has that situation been the
24 same or has it been different? Has it been the typical prac-
25 tice for the common Board members to know what's going to

1 | happen at an annual meeting of TBN and its owned and operated
2 | companies or is it uncommon for the outside Directors to have
3 | advance knowledge of what's going to happen at a meeting?

4 | A I don't think that practice has changed signifi-
5 | cantly, Mr. Shook. I, I think it would be uncommon for them
6 | to have had prepared and sent to them a detailed agenda of
7 | that meeting. We simply hand it to them when they arrive and
8 | we spend the day in deliberations over that agenda and action
9 | is taken.

10 | Q In terms of National Minority TV for its annual
11 | meetings, are you aware of whether an agenda is prepared and
12 | distributed to the members of the Board prior to the time the
13 | meeting occurs today?

14 | A Mrs. Duff oversees that. And whether or not she
15 | gets that agenda, there is typically an agenda, but whether or
16 | not that is sent out and made available to other members of
17 | the Board, I, I have no independent knowledge of that.

18 | Q Are you aware before a meeting takes place of what's
19 | going to happen at the annual meeting of National Minority?

20 | A General speaking, yes.

21 | Q And how is it that you become aware?

22 | A An agenda, as I said, typically is prepared, usually
23 | by Mrs. Duff.

24 | Q When you get that agenda, does it reflect a distri-
25 | bution list?

1 A I, I don't really recall.

2 Q Now, let's move to the topic of Special Meetings as
3 opposed to the annual meetings. Now, by their very nature it
4 seems to me that Special Meetings are ones that come up on
5 relatively short notice. Would that be fair?

6 A Yes, sir.

7 Q For TBN, would there be a practice of preparing an
8 agenda for a Special Meeting and distributing that beforehand
9 so that the Board members would have advance knowledge of what
10 was going to be considered?

11 A There may or may not be an agenda prepared and it
12 may or may not be distributed. These special Board meetings
13 typically are triggered by an event that demands a meeting, an
14 opportunity to do this or to do that or to buy a piece of
15 property, sell a piece of property, engage in some business
16 activity. Sometimes it can come on very short notice, and so,
17 typically, it would be a phone call from Mr. Juggert to me or
18 me to Mr. Juggert or, or my wife to Mr. Juggert or, or what-
19 ever, and we simply then would convene that meeting and con-
20 duct the, the business.

21 Q So, whether or not an agenda would be prepared or
22 distributed is almost exclusively a function of the urgency of
23 the question to be considered?

24 A A, a very fair statement.

25 Q But there have been occasions when agendas have been

1 prepared and distributed prior to a Special Meeting so that
2 Board members would have a chance to give some thought to what
3 it is they're going to be meeting about?

4 A Certainly prepared, but not necessarily distributed,
5 because typically we've already discussed this over the tele-
6 phone, we know pretty much the purpose of the meeting, what's
7 on the agenda, what's going to be there, but then typically my
8 secretary would prepare for me -- you know, there might be
9 other little laundry list items of things that we need to
10 attend to or talk about, and I would typically have that
11 agenda with me but no, it would be very untypical for an
12 agenda to have been distributed to other members of the Board.

13 Q But it would be typical for you and the other Board
14 members to have at least talked on the telephone beforehand so
15 that you could alert each other as to not only that there is
16 going to be a meeting but why you're meeting?

17 A That, that may have -- that, that certainly is --
18 has occurred, yes.

19 Q It has occurred, but it's not a common practice?

20 A What is common? I -- you know, I, I really don't
21 know.

22 Q More often than not.

23 A Probably more often than not we would simply have
24 discussed it either personally on the phone, agreed to meet at
25 a certain time, certain place to actually -- and in some cases

1 the Board meeting has been conducted right over the telephone.

2 Q Conference call?

3 A Exactly.

4 Q All right. I'm, I'm just trying to get a feel for
5 how you do business. And in terms of the special meetings,
6 what I hear you telling me, and correct me if I'm mistaken, is
7 that typically from a special meeting that there would at
8 least be advance telephone notice given to the individual
9 Board members, not only that they were -- that there was going
10 to be a meeting, but also what the meeting was about, so they
11 would at least have an opportunity to think a little bit about
12 the problems that they were going to be dealing with.

13 A That certainly could happen. Quite frankly, Mr.
14 Shook, there have been times when something has come so quick-
15 ly I've picked up the phone and called Mr. Juggert and said
16 Norm, Jan's in the other room and, and here's the situation
17 and we've got to act now. And, and we -- there have been
18 occasions when we've had a Board meeting right there on the
19 spot with no advance notice, no nothing. We just do it right
20 then and there over the telephone. That's the convenience,
21 really, of a, of a small close-knit Board. You really get
22 things done quickly without all of this time that el-- that
23 elapses with huge Board of Directors and the attendant
24 bureaucracy.

25 Q With respect to NMTV, shifting gears now, Special

1 Meetings, is there, to your knowledge, a typical process that
2 takes place in terms of notification of Board members and what
3 the contents of that notification would be?

4 A The events I've described for, for Trinity would be
5 certainly similar to those with NMTV. There would be occa-
6 sions where the, the urgency of the matter demanded immediate
7 attention, and of course Mrs. Duff was generally the liaison,
8 the coordinator, the, the point person to coordinate and bring
9 those meetings together. There might have been some notice
10 sent out. If so, Mrs. Duff would have to have given testimony
11 to that. I am not personally aware of how, when, or even if
12 prior agendas were distributed to Board members. All I know
13 is when a Board meeting occurred I was in most cases there and
14 we conducted business, either in person or ac-- in some cases,
15 action by written consent, in some cases over the telephone.

16 Q For TBN, then, shifting back, would it be fair to
17 state that for a, a Special Meeting that you were the person,
18 as President, that was generally driving the agenda?

19 A Yes, sir. I, I think that's a very fair statement.

20 Q And if we shift gears to NMTV, it would be your
21 testimony that it wasn't you necessarily who was driving the
22 agenda but Mrs. Duff?

23 A I -- yes. Absolutely.

24 Q That's how you understood the typical meeting to, to
25 go, who was in charge, where are the ideas coming from, et

1 cetera?

2 A Yes.

3 Q With respect to National Minority Annual Meetings,
4 we did talk about the present but I don't know if we covered
5 prior years in terms of whether there was a typical practice
6 relative to the preparation and distribution of an agenda
7 prior to the time the meeting took place. Are you aware of
8 any such practice?

9 A No, sir, I am not. In those earlier years, there
10 was such a little bit of activity and, and so much uncertainty
11 as to even what this little fledgling company was going to
12 evolve into till -- it was, it was virtually dormant for years
13 with the exception of just a few applications, I guess, that
14 had been filed in those earlier years.

15 Q Let me focus on the period, say, 1988 through 1992.
16 Now, in 1988 the company did have its first separate Annual
17 Meeting, according to the Minutes that we have that's in
18 evidence, and continued thereafter, so far as we can tell, to
19 have separate Annual Meetings. Would there have been, to your
20 knowledge, and agenda prepared and distributed prior to the
21 time of the meeting so as to alert Board members as to what
22 was going to be discussed?

23 A There may have been, but I have no independent
24 knowledge of that.

25 Q Now, I'd like you to focus specifically on paragraph

1 17 of your testimony and, basically, pay particular attention
2 to the last two sentences.

3 JUDGE CHACHKIN: That's page 7, Dr. Crouch.

4 DR. CROUCH: Yes, I'm there. Yes, I, I've read 17.

5 BY MR. SHOOK:

6 Q Now, the way I understand 17 is that -- okay. NMTV
7 at present has the Portland station and it has a number of
8 low-power stations --

9 A Yes.

10 Q -- and that during a typical week you would devote
11 either no time to NMTV matters or no more than a half-hour?

12 A That is my best estimate.

13 Q Now, how much time would you devote to the adminis-
14 tration of, say, Arizona during a typical week?

15 A Well, you picked a good one, Mr. Shook. We've just
16 installed a brand new transmitter there, so this past year has
17 been rather heavy on, on Arizona. I think what you're asking
18 for here is a typical owned and operated station. It would
19 certainly be more than National Minority because, as you'all
20 know, Mrs. Duff certainly leads the effort in, in that area
21 for Portland. I can only give you a -- my best guess. I
22 would say a couple of hours a week perhaps or more on each
23 owned and operated station.

24 Q All right. Now, that would be the, at this point,
25 the 11 stations that TBN would characterize as owned and

1 operated?

2 A Yes.

3 Q So, if we have a couple of hours a week, typically
4 you'd be devoting 11 times two, or 22 hours a week, to the
5 operations of the owned and operated stations?

6 A It's hard to distinguish, I guess, business that
7 affects only that station with --

8 Q I, I recognize it's not an easy thing to --

9 MR. TOPEL: Mr. Shook.

10 MR. SHOOK: -- do.

11 MR. TOPEL: Mr. Shook? I'm sorry. The witness, I
12 think, was in the middle of answering the question.

13 MR. SHOOK: Well, we're having a little dialogue
14 here.

15 MR. TOPEL: Sure. I won't interrupt, but I would
16 appreciate it if, if the witness has a chance to finish his
17 answer. I'm sorry, Your Honor. I know it --

18 JUDGE CHACHKIN: Does the witness have anything
19 further to add?

20 DR. CROUCH: Only to say that I, I, I feel that even
21 that two-hour segment that I'm talking about per station would
22 probably involve programming and things that were common --
23 it's just real difficult, Mr. Shook, to, to distinguish items
24 of, of attention and business that relate only to a particular
25 owned and operated station from matters that affect it as well

1 as the other stations.

2 BY MR. SHOOK:

3 Q Do you devote -- can you, can you say that you
4 devote any particular amount of time -- well, let me backtrack
5 a second. Are you presently an Officer and Director of
6 Community Educational Television?

7 A Yes.

8 Q And that corporation has three stations?

9 A Yes.

10 Q Would there be some typical amount of time per week
11 that you would devote to the oversight of -- you know, focus-
12 ing -- try to draw parallels between what's happening with
13 both stations and NMTV. How much time typically would you
14 devote to CET matters?

15 A I would put CET and JEB roughly in the same category
16 with NMTV. I -- there would be weeks when I devote no effort
17 whatsoever to those entities; other weeks where I, I'm going
18 to put it basically in the same category as NMTV, perhaps on
19 the, on the average, a half-an-hour a week.

20 Q All right. So, we have a half-hour per week typi-
21 cally for NMTV, a half-hour a week for JEB, a half-hour a week
22 for CET, 22 hours per week for the owned and operated
23 stations?

24 A I think that's about the best I can do.

25 Q Other than those categories that we've just gone